Anchorage Water & Wastewater Utility

General Manager's Office

Mayor
Ethan Berkowitz

Board Chair
Aaron D. Dotson

November 22, 2019

Jamey L. Stoddard, Environmental Scientist
NPDES Permits Section
USEPA Region 10
Mail Code: 19-H16
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

RE: Information Request for PFOS/PFOA Indirect Discharge

Dear Mr. Stoddard,

This letter responds to questions sent to me in an email dated October 23, 2019. Anchorage Water & Wastewater Utility (AWWU) provides the responses in this letter voluntarily, reserving its right to discuss these and other questions in the context of applicable law. AWWU agrees with EPA's statement that EPA has established no standards that apply to the AWWU discharge and that the waste streams discussed in this response may not constitute a "substantial" change in the volume or the character of pollutants being discharged.

Responses to your questions regarding the indirect waste streams to AWWU's John M. Asplund Wastewater Treatment Facility (AWWTF), specifically from NRC Alaska LLC (NRC) and the Temporary Industrial Discharge Permit (TIDP) 2019-006 issued to them for PFOS/PFOA-contaminated wastewater from multiple sources, including the Ted Steven Anchorage International Airport, are provided below:

- *I believe you indicated that notification was provided to EPA in a pretreatment report. I checked with our pretreatment coordinator Michael Le and he indicated that we would only typically be notified of changes to the pretreatment program with the annual pretreatment report due February of each year as required by AWWU's NPDES permit. I reviewed your annual pretreatment report dated Feb 14, 2019, and did note the language in the section "Year Ahead Plans" re: a decision to further evaluate discharges of PFOS/PFOA and that a Policy was being developed to align the acceptance of this type of wastewater with State and Federal guidelines, but didn't see anything specific to an actual discharge or new permit for PFOS/PFOA-contaminated wastewater. Was that the notification you were referring to, or is there something specific to the recent TIDP to NRC that you can point me to?*

Yes, and prior to the issuance of TIDP 2019-006 AWWU's Industrial Pretreatment Coordinator had discussions with EPA's Region 10 Pretreatment Coordinator about AWWU's acceptance of this waste stream and how to control certain compounds when no Water Quality Standards or Local Limits have been promulgated for those compounds.

- *Identification of all sources of PFOS/PFOA-contaminated waters being accepted/treated by NRC and discharged via Asplund. The TIDP 2019-006 language states "Several sources, including Ted Stevens International Airport." We just need a clear and full accounting of all the sources. For instance, I have come to understand the State of Alaska has approved Fairbanks International Airport's new plan to have NRC collect, treat, and dispose of fire control test pit water contaminated with PFOS/PFOA as well as hydrocarbons and arsenic at the NRC facility in Anchorage. Would this be covered under TIDP 2019-006?*

Yes, TIDP 2019-006 issued to NRC covers a limited volume of water discharged from NRC to AWWU. NRC receives wastewater under State or Municipality approved plans that authorize NRC to collect and treat wastewater contaminated with PFOS/PFOA, hydrocarbons, and arsenic at the NRC facility in Anchorage, including fire control test pit water from Fairbanks International Airport and other source waters from Ted Stevens Anchorage International Airport, and Petro Star.

In the initial permit application, NRC planned to discharge a total of 150,000 gallons under that permit. In late September, they requested it be increased to approximately 400,000 gallons for that permit. TIDP 2019-006 expires December 31, 2019. The Discharges from NRC to AWWU have been within the limits set by the TIPD and are not substantial in relation to the total volumes received at the AWWTF.

- *For each source identify the volume, characteristics, and frequency of the past and future discharge events (i.e., Ted Stevens: 200k gallon batch of wastewater contaminated with X,Y,Z discharged once a month for the next two years; Fairbanks Airport: 20k batch discharge contaminated with X,Y,Z, bi-weekly for next 10 months; JBER: 10k continuous daily discharge contaminated with X,Y,Z for next 6 months etc.).*

1. Ted Stevens Anchorage International Airport (AIA): A total of 40,000 gallons of wastewater received from AIA and treated by NRC has been discharged to AWWU under TIDP-006. The water was generated by a fire training station where the water had collected. AIA had historically aerated and then released this water to the storm drain system. This process was covered by an Alaska Department of Environmental Conservation (ADEC) discharge permit for the fire pit. At the time, petroleum was the main issue and PFAS was not a concern. The wastewater was tested for GRO, DRO and BTEX. It was relatively clean for those constituents after the aeration pond treatment.

   As the AIA became aware of concerns about PFAS, AIA engaged a contractor to dispose of the contaminated waters. The fire pit has been closed down and will be closed out with the ADEC Contaminated sites program. To our knowledge, TSIA no

longer has plans to discharge PFAS contaminated waters to NRC for treatment and discharge to the AWWU.

2. Fairbank International Airport (FAI): The total amount of water transported from the FAI Fire Training Pit to NRC was 135,700 gallons. FAI is closing down and capping its pit, so NRC in Anchorage is not expecting to be receiving wastewater from this source.

3. Petro Star: To date a total of 130,000 gallons of wastewater received from Petro Star and treated by NRC has been discharged to AWWU under TIDP-006. The wastewater was generated by an actual fire event on the fuel loading area at the Port of Alaska.

4. NRC has confirmed with AWWU that NRC has not treated any PFAS wastewater from JBER and has no immediate future plans to do so.

- *The efficacy of the NRC treatment process (analytical results of influent vs effluent concentrations of all pollutant parameters analyzed for each discharge event)*

For setting discharge limits for TIDP 2019-006, AWWU considered the guidance set by the State of Alaska for PFOS/PFOA, Alaska Administrative Code (AAC) Title 18 Chapter 75 – Oil and Other Hazardous Substances Pollution Control, Table C Groundwater Cleanup Levels. The ADEC has set groundwater cleanup level for PFAS compounds of 0.40 ug/L for Perfluoro-octane-sulfonic Acid (PFOS) and 0.40 ug/L for Perfluoro-octanoic Acid (PFOA).

AWWU is still in the process of working with NRC to finalize a report that will summarize the analytical results of their treatment process, which can be made available at a later date when it is complete.

- *Any current, past or future PFAS/PFOA samplings and analytical results at the Asplund wastewater treatment plant itself, including biosolids analysis (I believe you indicated the incineration process has been effective at eliminating PFOS/PFAS.)*

In May of 2010, AWWU performed a comprehensive study of the volume and characteristics for both regulated and unregulated pollutants, including PFOS/PFAS, in the influent and effluent discharge. The analytical data and quality control measures were summarized and made available to EPA in the *Evaluation of the Effects of Discharge Permit Reauthorization on Endangered species (CH2MHill, Feb. 1, 2011)*.

A copy of the report and analytical PFOS/PFAS results can be found in the report at the link below:

https://www.awwu.biz/Home/ShowDocument?id=1836

In August of 2016, the EPA Office of Research and Development conducted sampling of target PFAS analytes to characterize AWWU's influent, effluent and pre-incinerated solids

in coordination with sampling conducted a Joint Base Elmendorf-Richardson (EPA memorandum to Sandra Halstead, Superfund Site Manager, Aug. 19, 2019).

The EPA memo and EPA data results are attached to the email with this letter.

AWWU intends to participate with EPA on additional research and characterization of PFAS in our biosolids incineration process. AWWU is coordinating with EPA's Sue Detwiler and Linda Anderson-Carnahan, who directs the EPA Region 10 Lab Sciences program.

Correspondence from Sue Detwiler, EPA Director of Alaska Operations, is attached to this the email with this letter.

If you have any questions regarding the information provided or if we can be of any further assistance, please contact me at (907) 786-5511 or mark.corsentino@awwu.biz.

Respectfully,

Mark A. Corsentino, P.E.
General Manager

cc: Tim Forbus, AWWU Treatment Division Director
John Plaskett, AWWU Environmental Compliance Advisor